

Exhibit A



45 WEST 29TH STREET, SUITE 303
NEW YORK, NEW YORK 10001
CHAUDHRYLAW.COM

February 11, 2022

Via Email

AUSA Kiersten A. Fletcher
AUSA Robert B. Sobelman
AUSA Sheb Swett
United States Attorney's Office
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

Re: *United States v. Jennifer Shah*, S4 19 Cr. 833 (SHS)

Dear Counsel:

We represent Defendant Jennifer Shah in the above-captioned case. We write to provide the Government with notice, pursuant to Rule 16(b)(1)(C), that Ms. Shah may call at trial Przemyslaw Jeziorski, a professor at the Haas School of Business at the University of California at Berkeley. Professor Jeziorski may testify regarding the following topics: marketing analytics; quantifying and qualifying leads; lead generation methods; lead brokering; data scraping; the use of salesfloors and fulfillment companies, including commission structures; the use of CRMs; upselling; chargebacks; and general small business success rates. Professor Jeziorski's *curriculum vitae* is attached hereto.

Ms. Shah also reserves the right to call any expert witness in rebuttal to any witness called by the Government. In the event that Ms. Shah may call any additional expert witnesses, Ms. Shah will promptly provide notice to the Government.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Priya Chaudhry', enclosed within a large, loopy oval shape.

Priya Chaudhry

Encl.

Przemysław Jeziorski

Feb 11th, 2022

CONTACT INFORMATION

Haas School of Business
2220 Piedmont Avenue
University of California at Berkeley
Berkeley, CA 94720-1900

510.643.7183
przemekj@berkeley.edu
<http://jeziorski.me>

RESEARCH
INTERESTS

Quantitative Marketing, Industrial Organization, Antitrust and Regulation, Digital Marketing, Fintech

EMPLOYMENT

Haas School of Business, Berkeley, CA
Associate Professor of Marketing (with tenure)
Egon & Joan Von Kaschnitz Distinguished Professorship
Barbara and Gerson Bakar Faculty Fellow
Schwabacher Fellow

July 2018 – present

Keybee Inc., Berkeley, CA
Co-founder

Jan 2016 – present

Haas School of Business, Berkeley, CA
Assistant Professor of Marketing

Jan 2012 – July 2018

National University of Singapore, Singapore
Senior Research Fellow

Aug 2015 – Sept 2015

Johns Hopkins University, Baltimore, MD
Assistant Professor of Economics

July 2010 – Dec 2011

Microsoft Research, Mountain View, CA
Visiting Scholar

Sep 2008 – June 2010

Stanford University, Stanford, CA
Research Assistant

Aug 2008 – June 2010

Microsoft Research, Mountain View, CA
Research Intern

June 2008 – Sep 2008

University of Arizona, Tucson, AZ
Lecturer and Teaching Assistant

Aug 2004 – July 2008

EDITORIAL SERVICE

Associate Editor
Management Science, Quantitative Marketing and Economics

Editorial Board
Marketing Science

EDUCATION

Stanford Graduate School of Business, Stanford, CA

Ph.D. Economic Analysis and Policy

2006 – 2010

- Dissertation Title: *Essays in Mergers and Antitrust*
- Primary adviser: Peter Reiss
- Additional Committee Members: Lanier Benkard, Benjamin van Roy, Ilya Segal, Ali Yurukoglu

University of Chicago, Chicago, IL

Price Theory Scholar, Becker Center at Booth School of Business 2008 – 2009

University of Arizona, Tucson, AZ

M.S. Mathematics 2004 – 2006

- Thesis Title: *Numerical and Analytical Solutions to Dynamic Games*
- Primary Adviser: Moysey Brio

M.A. Economics 2004 – 2006

- Primary Adviser: Rabah Amir

Warsaw School of Economics, Warsaw, Poland

M.A. Quantitative Methods and Information Systems 2001 – 2004

- Thesis Title: *Methods of Stochastic Search*
- Primary Adviser: Tomasz Szapiro

B.A. Quantitative Methods and Information Systems 2001 – 2004

- Thesis Title: *Migrations of Human Capital and Economic Growth*
- Primary Adviser: Tomasz Szapiro

PUBLISHED
PAPERS

Empirical Model of Dynamic Merger Enforcement – Choosing Ownership Caps in U.S. Radio
2021, accepted, *Management Science*, find at <http://jeziorski.me>

Skimming from the bottom: Empirical evidence of adverse selection when poaching customers
(with E. Kransokutskaya and O. Ceccarini)
2019, *Marketing Science*, 38(4): 543-566, find at <http://jeziorski.me>

Advertiser prominence effects in search advertising
(with S. Moorthy)
2017, *Management Science*, 64(3): 983-1476 find at <http://jeziorski.me>

Mobile Money in Tanzania
(with N. Economides)
2017, *Marketing Science*, 36(6): 815-837 (lead article), find at <http://jeziorski.me>

Dynamic Auction Environment with Subcontracting
(with E. Krasnokutskaya)
2016, *RAND Journal of Economics*, 47(4): 751-791 (lead article), find at <http://jeziorski.me>

Oblivious Equilibrium for Concentrated Industries
(with C. L. Benkard and G. Y. Weintraub)
2015, *RAND Journal of Economics* 46(4): 671-708 (lead article), find at <http://jeziorski.me>

What Makes them Click: Empirical Analysis of Consumer Demand for Search Advertising
(with I. Segal)
2015, *AEJ: Microeconomics*, 7(3): 24-53, find at <http://jeziorski.me>

Estimation of Cost Synergies from Mergers: Application to U.S. Radio
2014, *RAND Journal of Economics*, 45(4): 816-846, find at <http://jeziorski.me>

Effects of Mergers in Two-sided Markets: The U.S. Radio Industry
2014, *AEJ: Microeconomics*, 6(4): 35-73, find at <http://jeziorski.me>

Structural models of complementary choices
(with S. Berry, A. Khwaja, V. Kumar, A. Musalem, K. Wilbur,

G. Allenby, B. Anand, P. Chintagunta, M. Hanemann, A. Mele)
2014, *Marketing Letters*, 25(3): 245-256, find at <http://jeziorski.me>

WORKING
PAPERS

Quantifying Diminishing Return to Mammography Screenings Using Individual Medical Histories
(with Teck-Hua Ho and Sadat Reza)
2021, draft available by request

Adverse Selection and Moral Hazard in a Dynamic Model of Auto Insurance
(with E. Kransokutskaya and O. Ceccarini)
2021, under review, draft available by request

Nonstationary Oblivious Equilibrium
(with C. L. Benkard, B. Van Roy and G. Y. Weintraub)
2009, preliminary draft, find at <http://jeziorski.me>

GRANTS

Clausen Center,
Fintech Innovation to Promote Financial Access and Contactless Banking – \$12,500 **2021**
During Pandemics, PI

Institute for Business and Social Impact Berkeley Fintech and Financial
Inclusion Initiative,
Fintech Innovation to Promote Financial Access and Contactless Banking – \$65,000 **2021**
During Pandemics, PI

Center for Equity, Gender & Leadership,
Credit Access and Determinants of Entrepreneurial Success, PI – \$5,000 **2020**

Clausen Center,
Credit Access and Determinants of Entrepreneurial Success, PI – \$5,000 **2020**

Fisher Center for Business Analytics,
Credit Access and Determinants of Entrepreneurial Success, PI – \$15,000 **2020**

CEGA-VISA Financial Inclusion Lab Pilot Funding
Financial Inclusion and Credit Contracts in Repeated Borrowing – \$20,000 **2016**
Relationships, PI

Bill & Melinda Gates Foundation
Mobile Banking in Africa, PI – \$35,000 **2013**

HONORS AND
AWARDS

Barbara and Gerson Bakar Faculty Fellow **2019-2020**

Schwabacher Fellow **2018**

Best paper award, Warsaw International Economic Meeting **2009**

Stanford GSB Fellowship **2006-2010**

University of Arizona Fellowship **2004-2005**

EXPERT
TESTIMONY

Opioid marketing
City and County of San Francisco and the People of the

*State of California by and through the City Attorney
Dennis Herrera v. Purdue et al.
Case No. 3:18-cv-07591- CRB*

2021

TEACHING
EXPERIENCE

Berkeley Haas

MBA 263: Marketing Analytics
Teaching rating: 6.12/7.00

2014-2022

PHDBA 269B: Choice Models
Teaching rating: 7.00/7.00

2017-2022

PHDBA 297T: Computational Methods for Economics and Marketing
Teaching rating 7.00/7.00

2014-2016

UGBA 106: Introduction to Marketing (Undergraduate)

2012-2013

Johns Hopkins University

Multi-agent numerical methods (PhD)

2010-2012

Stanford University

Teaching Assistant: Graduate Microeconomics

2010

University of Arizona

Lecturer: Economics of Information

2009

Teaching Assistant: Graduate Macroeconomics, Industrial Organization, Graduate Microeconomics, Intermediate Microeconomics, Economics of Regulated Industries

2004-2006

ACADEMIC
SERVICES

Conferences

SICS Conference, Marketing Analytics Day Organizer

2015-2019

Journal Referee

Games and Economic Behavior, American Economic Review, Journal of Industrial Economics, International Journal of Industrial Organization, Review of Economic Studies, RAND Journal of Economics, Marketing Science, Economic Journal, Journal of Marketing Research, AEJ: Microeconomics, AEJ: Policy, Review of Economics and Statistics, Journal of Political Economy, Journal of Economics and Business, Journal of the European Economic Association, Electronic Commerce Research and Applications, Econometrica, Management Science, Journal of Marketing

INVITED TALKS

Virtual Quant Marketing Seminar, Temple University

2021

Marketing Science Conference, SICS Conference

2019

University of Texas, Austin (economics)

2018

University of Iowa (economics)

University of Wisconsin-Madison (economics),

Santa Clara University (marketing),

Stanford GSB (marketing), UTD-FORMS Conference (discussant),

Rochester University (marketing), Carnegie Mellon University (marketing),

Marketing Science Conference

2017

ASSA American Economic Association, Marketing Science Conference, Rice University (economics), Society for Economic Dynamics Conference, The 3rd Annual Empirical Microeconomics Workshop – University of Calgary, Conference on Big Data in Economics – University of Southern California, Yale University (marketing)	2016
Duke University (marketing), NYU Stern (economics), University of Minnesota (economics), Northwestern University (marketing) Harvard University (economics), Boston College (economics)	2015
Marketing Dynamics Conference, NYC Media Seminar at Associated Press, QME Conference	2014
Net Institute Conference (discussion), 9th Invitational Choice Symposium, Marketing Science Conference, Summer Institute in Competitive Strategy, Federal Communication Commission, University of Virginia (economics), Marketing-Industrial Organization Conference, University of Michigan (economics), Washington University in St. Louis (economics), UC Los Angeles (marketing), ASSA Industrial Organization Society (session chair), ASSA Econometrics Society (session chair), ASSA American Economic Association	2013
University of Toronto (marketing), University of Rochester (marketing), UT Dallas (marketing), Chicago Booth (marketing), Marketing Science Conference, NBER Summer Institute, Stanford GSB (marketing)	2012
ASSA Meetings Denver, Federal Trade Commission, Marketing-Industrial Organization Conference, QME Conference (discussant), UC Berkeley (marketing)	2011
Yale University (economics), Princeton University (economics), Columbia University (economics), Northwestern University (economics) New Economic School (economics), University College London (economics), Federal Reserve Board, Johns Hopkins University (economics), UC Los Angeles (economics)	2010
Stanford University (economics), UC Berkeley (marketing), Warsaw University (economics)	2009